

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA, )

)

Plaintiff, )

v. )

)

ERICK DAYON DANIELS, )

Case Number: CR 13-6-M

)

Defendant. )

**UNOPPOSED MOTION TO  
ENLARGE TIME WITHIN WHICH TO FILE  
MOTIONS AND BRIEF IN SUPPORT THEREOF**

COMES NOW, Terri Coulter, attorney for Defendant, Erick Dayon Daniels, and would request the Court to enter an order enlarging the time within which to file motions. In support of this motion, Counsel would state as follows:

1. Defendant is charged in a one count indictment charging a violation of 21 U.S.C. § 846, conspiracy to possess with intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine.
2. Defendant was arraigned on January 16, 2013, and entered a plea of not guilty. Trial is currently set for March 12, 2013.
3. Pursuant to L CrR 12.1(a) all pretrial motions shall be filed and served within 21 days from the date a plea of not guilty is entered. Defendant's pretrial motions are currently due February 6, 2013.

4. This case arises from three separate wiretaps. Counsel for Defendant has timely received a massive amount of discovery. Counsel for Defendant and counsel for the government are diligently discussing possibilities for some resolution of the case. Defendant resides in Euless, Texas and meetings with counsel are not easily arranged.
5. Counsel for Defendant moves the Court to grant an additional 14 days from the motion deadline of February 6, 2013 to extend the deadline for filing pretrial motions to February 20, 2013. This request will have no impact on the trial date.
6. Counsel for the government, David P. Petermann, has affirmed that he has no objection to the requested extension.
7. This motion is not made for any reason of delay.

Respectfully submitted,

s/Terri Coulter

---

Terri Coulter, OBA #11274  
Attorney for Defendant,  
Erick Dayon Daniels  
3955 N. W. 23<sup>rd</sup> Street  
Oklahoma City, Oklahoma 73107  
Phone: 405-947-1937  
Facsimile: 405-947-1937  
Email: tcoulter@swbell.net

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of February 2013, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

David P. Petermann  
Assistant United States Attorney

*s/Terri Coulter*  
Terri Coulter, OBA #11274